



APEX LLC

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November 21, 2011

**United States Bankruptcy Court for the Southern District of New York**

The Chambers of the Honorable James M. Peck

Attn: Honorable James M. Peck, Courtroom 601

One Bowling Green

New York, NY 10004

USA

**Re: Request of your Next Procedure after Filing the Written Objection to the Notice of Proposed Assumption of Executory Contracts and Unexpired Leases Pursuant to Debtors' Third Amended Joint Chapter 11 Plan Pursuant to Section 1121 of the Bankruptcy Code**

Dear Honorable James M. Peck,

We are acting as the legal counsel to SHINHAN BANK ("SHINHAN"), located in South Korea. We received a document entitled Notice of Proposed Assumption of Executory Contracts and Unexpired Leases Pursuant to Debtors' Third Amended Joint Chapter 11 Plan Pursuant to Section 1121 of the Bankruptcy Code dated October 27, 2011 from Weil, Gotshal & Manges LLP (attorneys for the Debtors) on November 3, 2011.

On November 8, 2011, we sent written objection letters to (i) United States Bankruptcy Court, (ii) Weil Gotshal & Manges LLP, (iii) The Office of the United States Trustee for region 2 and (iv) Milbank, Tweed, Hadley & McCloy LLP by specifying the nature of the objection and the proposed cure amount.

Please kindly advise us of your next procedure either via mail or email at [jbpark@apexlaw.co.kr](mailto:jbpark@apexlaw.co.kr). In particular, please inform us whether the attorney representing SHINHAN must be admitted to practice law in the State of New York.

Should you have any further queries, please contact us at 82-2-2018-0992 or 82-10-3252-9955 and ask for Mr. Jong Baek Park.

Yours sincerely,

APEX LLC

Jong Baek Park, Partner  
Do Hoon Woo, Associate  
Seung Hyo Baek, Associate

